

BEFORE THE
Federal Communications Commission
WASHINGTON, D.C.

ORIGINAL
ORIGINAL
FILE
RECEIVED

MAR 16 1992

Communications Commission
Office of the Secretary

In the Matter of) RM-
)
Amendment of Section 73.202(b)) MM Docket No. 92-
of the Commission's Rules)
Table of Allotments)
FM Broadcast Stations)
(Boone, Iowa))

To: Chief, Allocations Branch,
Policy and Rules Division
Mass Media Bureau

PETITION FOR RULEMAKING

Radio Ingstad of Iowa, Inc. ("Ingstad"), licensee of FM station KIAB(FM) which operates on channel 252^{1/} at Boone, Iowa, by its attorneys, hereby petitions the Commission for the initiation of a rulemaking proceeding to amend the Table of FM Allotments, Section 73.202(b) of the Rules. Specifically, Petitioner requests the following amendments to the Table of FM Allotments:

<u>City</u>	<u>Present</u>	<u>Proposed</u>
Boone, Iowa	252C3	252C2
Emmetsburg, Iowa	252A	261A

1/ KAIB(FM) is currently operating as a Class A station on channel 252. Although KAIB (formerly KWBG-FM) presently has an outstanding construction permit to operate as a Class C3 station (BPH-900919II), Ingstad believes that it would be more efficient and preferable to improve KAIB to a Class C2 facility in one step.

1. In order to make the proposed allocation of FM channel 252C2 at Boone, a modification of the entry in the Table of Allotments for Channel 252A at Emmetsburg, Iowa is necessary, as is a modification to the license of Radio Station KEMB(FM), which occupies that allotment. KEMB would be required to change channels from 252A to 261A and move its transmitter site. Ingstad has agreed to reimburse KEMB for all reasonable expenses required for the transmitter site move and the change in frequency, if the instant petition is successful, and KEMB has agreed to the necessary channel change and has stated its willingness to use the coordinates 43 04' 00" N, 94 49' 00" W for the proposed channel 261A allocation at Emmetsburg. A Class A facility located at those coordinates would be fully spaced, and would provided the required 3.16 mV/m signal to Emmetsburg. See Exhibit A (Letter from Roger J. Jacobson, President of Jacobson Broadcasting Companies to James D. Ingstad dated March 14, 1992). This channel move would have the added benefit of allowing KEMB to increase power from 3 kW to 6 kW.

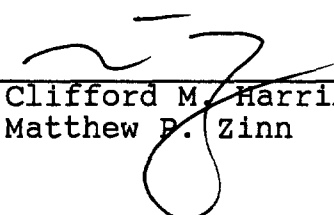
2. From the proposed reference coordinates, the proposed facilities on channel 252C2 at Boone, and channel 261A at Emmetsburg would both meet the spacing requirements as set forth in Section 73.207 of the Commission's Rules. See Exhibit C (Engineering Study for Channel 252C2 at Boone, Iowa) and Exhibit D (Engineering Study for Channel 261A at Emmetsburg, Iowa).

3. The allotment of channel 252C2 to Boone will permit expanded coverage by Petitioner, thereby improving service to the public and promoting spectral efficiency. Endicott, New York, 51

F.C.C.2d 50, 51 (1975). As this modification is on KIAB's existing channel and mutually exclusive with its present operation, no competing expressions of interest are permitted. FM Stations (Upgrade on Existing or Adjacent Channel), 60 R.R.2d 114 (1986).

For the foregoing reasons, Petitioner respectfully requests that the Commission adopt the proposal set forth herein, including specifically the allotment of channel 252C2 to Boone, Iowa, and the modification of the license of KIAB(FM) to specify operations on the new channel. Should this be done, Petitioner will promptly file an application for the specific Class C2 facilities to be used by KIAB(FM) to implement the change in Class.

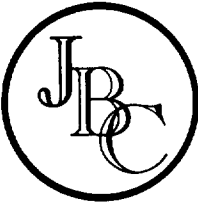
Respectfully submitted,
RADIO INGSTAD OF IOWA, INC.

By: 
Clifford M. Harrington
Matthew P. Zinn

FISHER, WAYLAND, COOPER
AND LEADER
1255 23rd Street, N.W.
Suite 800
Washington, D.C. 20037-1125
(202) 659-3494

Date: March 16, 1992

EXHIBIT A



P.O. Box 453
Estherville, Iowa 51334
712-362-2644

Jacobson Broadcasting Companies

MARCH 14, 1992

MR. JAMES D. INGSTAD, PRESIDENT
RADIO INGSTAD OF IOWA, INC.
3301 S. UNIVERSITY DRIVE
FARGO, ND 58107

DEAR MR. INGSTAD:

THIS IS IN REGARD TO YOUR PROPOSAL TO INCREASE THE POWER OF KIAB(FM), BOONE TO OPERATE AS A CLASS C2 FACILITY ON CHANNEL 252A. AS YOU KNOW, RADIO STATION KEMB(FM) OPERATES ON CHANNEL 252A IN EMMETSBURG, AND AN UPGRADE OF KIAB TO A CLASS C2 FACILITY WOULD BE SHORT-SPACED TO KEMB'S PRESENT OPERATION. IN VIEW OF THE FACT THAT YOU HAVE AGREED TO PAY FOR ALL REASONABLE EXPENSES INCURRED IN CHANGING THE CHANNEL OF KEMB, AND BECAUSE THE MOVE WILL ALLOW KEMB TO INCREASE ITS POWER TO 6 KW, JACOBSON BROADCASTING CORPORATION CONSENTS TO A CHANGE IN CHANNELS FROM 252A TO 261A, AND IS WILLING TO MODIFY ITS LICENSE AS IS NECESSARY TO ACHIEVE THE CHANGES PROPOSED IN YOUR PETITION FOR RULE MAKING.

OBVIOUSLY, WHILE THE REFERENCE POINT TO BE SPECIFIED FOR THE CHANNEL 261A FACILITY WILL BE FULLY SPACED TO ALL OTHER STATIONS, THE PARTIES INTEND ON STATION KEMB BEING ABLE TO KEEP ITS TRANSMITTER SITE AT ITS PRESENT LOCATION AND BE ABLE TO OPERATE DIRECTIONALLY WITH 6 KW IN THE MAJOR LOBE AT SUCH EXISTING TRANSMITTER LOCATION. THEREFORE, IN THE EVENT THAT PRIOR TO BE SUCCESSFUL TERMINATION OF THE RULE MAKING PROCEEDING THERE SHOULD BE CHANGES IN CIRCUMSTANCES WHICH WOULD MAKE IT IMPOSSIBLE FOR STATION KEMB TO OPERATE WITH 6 KW, DIRECTIONAL OR NON-DIRECTIONAL, AT ITS PRESENT TRANSMITTER SITE, WE RESERVE THE RIGHT TO WITHDRAW THIS CONSENT AND TO TERMINATE OUR SUPPORT UPON WRITTEN NOTICE TO YOU AND THE FCC.

SINCERELY,

ROGER J. JACOBSON, PRESIDENT
JACOBSON BROADCASTING CORPORATION

RJJ:PSZ

EXHIBIT B

AGREEMENT

This Agreement is made and entered into this 14 day of March, 1992, by and between Radio Ingstad of Iowa, Inc. ("Ingstad") and Jacobson Broadcasting Corporation (Jacobson") (hereinafter sometimes collectively referred to as "the Parties").

WITNESSETH:

WHEREAS, Ingstad holds a license from the Federal Communications Commission ("FCC") to operate an FM radio station on channel 252C3 in Boone, Iowa ("Ingstad's Station"); and

WHEREAS, Jacobson holds a license from the FCC to operate an FM radio station on channel 252A in Emmetsburg, Iowa ("Jacobson's Station"); and

WHEREAS, Ingstad wishes to increase the power of Ingstad's Station to a Class C2 facility but is unable to increase the power of its station unless Jacobson's Station changes channels; and

WHEREAS, Jacobson desires to improve the facilities of its station and interposes no objection to changing channels; and

WHEREAS, except as provided herein, the obligations of the Parties hereunder are subject to the prior approval of the FCC, the Federal Aviation Administration ("FAA"), any other applicable governmental authorities, and the conditions herein:

NOW, THEREFORE, in consideration of the mutual promises herein contained, the Parties hereto agree as follows:

1. Ingstad will file promptly, and in any event within five (5) days of the date of this Agreement, a Petition for Rulemaking (Petition") with the FCC proposing:

- (a) substitution of channel 252C2 for channel 252Cs at Boone, Iowa;
- (b) modification of the license for Ingstad's Station to specify operation on channel 252C2;
- (c) substitution of channel 261A for channel 252A at Emmetsburg, Iowa; and
- (d) modification of the license for Jacobson's Station to specify operation on channel 261A.

On the date of this Agreement, Jacobson shall provide Ingstad with a letter from its principal stating that it consents to the proposal to substitute channel 261A for channel 252A at Emmetsburg, Iowa and is willing to modify the license for Jacobson's Station as is necessary to achieve the changes proposed in the Petition.

2. The Parties agree to take no action adverse to this Agreement or the Petition and to expeditiously provide to each other or to the FCC, or both, any additional information that may be necessary or appropriate to effectuate the objectives of this Agreement; provided, however, that Jacobson shall not be required to support the petition if it develops that, as a result of changed circumstances, Station KEMB will either (a) be required to change transmitter sites; and/or (b) will be unable to achieve 6 kW directional or non-directional facilities at its existing site, in which case Ingstad shall have no further obligation to Jacobson hereunder.

3. Ingstad shall be responsible for the filing of the petition for rule making and for the prosecution of such petition and shall pay all legal fees and engineering costs incurred in connection with such petition, regardless of the outcome of the petition. In addition, to the extent that this agreement requires the filing by Jacobson of an application or applications to the FCC, Ingstad promptly shall: (a) provide Jacobson with complete applications, including associated engineering studies, ready for final engineering and legal review; (b) reimburse Jacobson for any reasonable legal and/or engineering fees incurred in the reviewing or correcting said applications to Jacobson's reasonable satisfaction; and (c) reimburse Jacobson for the government filing fees connected with such application(s); provided, however, that the aggregate total of the fees reimbursed pursuant to subsections (b) and (c) above shall not exceed Four Thousand Dollars (\$4,000.00), payable as they occur.

4. Within ninety (90) days after the effective date of a final order or opinion by the FCC changing the Table of Allotments and the modifications to Ingstad's Station and Jacobson's Station as contemplated by this Agreement, Jacobson shall file an application for construction permit to specify operation of Station KEMB on Channel 261A at Emmetsburg, Iowa ("Modification Order"). For purposes of this agreement, a final order shall mean an order of the FCC or its staff acting pursuant to delegated authority which is no longer subject to administrative or judicial

reconsideration, review, or appeal, and as to which the time for seeking such reconsideration, review, or appeal has expired.

5. Subject to paragraph 7 of this Agreement, and within a reasonable period of time following the date that the FCC releases a public notice approving Jacobson's Modification Application, but in no event more than one hundred twenty (120) days after the grant of the Modification Application has become a final order, as defined herein, Ingstad agrees to perform the following acts:

- a. Ingstad agrees to pay Jacobson the amount of ONE THOUSAND TWO HUNDRED AND FIFTY DOLLARS (\$1,250.00) for new radio jingles;
- b. Ingstad agrees to pay Jacobson for cost of repainting Jacobson's Station's Western Outdoor Sign, provided, however, that such payment shall not exceed FIVE HUNDRED DOLLARS (\$500.00);
- c. Ingstad agrees to furnish Jacobson with a 1986 Harris transmitter and exciter used by station KNIQ-FM, Mason City, Iowa, upgraded to permit Station KEMB to operate with an Effective Radiated Power of 6kW, including antenna gain, in exchange for Jacobson's Station's current transmitter and exciter; and
- d. Ingstad agrees to furnish Jacobson with a new ERI FML Type 1/2 wave directional antenna tuned to channel 261A and install the antenna on the tower on which Jacobson is currently operating.

6. Subject to paragraph 7 of this Agreement, in addition to the payments due to Jacobson under the preceding paragraph, Ingstad agrees to pay Jacobson, as consideration for the foregoing, the amount of TWENTY FIVE THOUSAND DOLLARS (\$25,000.00) in the following manner: THIRTEEN THOUSAND DOLLARS (\$13,000.00) to be paid on the day before Jacobson's

Station begins operating on channel 261A ("Initial Payment"). The remaining TWELVE THOUSAND DOLLARS (\$12,000.00) shall be paid at the rate of ONE THOUSAND DOLLARS (\$1,000.00) per month for twelve (12) consecutive months, beginning the month directly following the Initial Payment.

7. With the exception of the obligations of Ingstad under paragraph 3 of this Agreement, the obligations of the Parties under this Agreement, are expressly conditioned upon the issuance of a Final Order by the FCC ordering the changes to the Table of Allotments and the modifications to Ingstad's Station and Jacobson's Station proposed by Ingstad in the Petition, without material adverse conditions.

8. When the time comes for Station KEMB to commence operations with Channel 261A, Ingstad will furnish Jacobson with the necessary materials and labor to install the Harris transmitter and exciter; change the operating frequency to Channel 261A; connect the transmitter to the antenna; and take such other steps as are necessary and/or appropriate to convert the KEMB transmitting plant from its present 3 kW operation on Channel 252A to 6kW directional operation on Channel 261A. Ingstad will assist Jacobson in preparing the necessary application for license to cover the Channel 261A construction permit, and will reimburse Jacobson in an amount not to exceed FIVE HUNDRED DOLLARS (\$500.00) for expenses related thereto.

9. This Agreement is the only Agreement between the Parties hereto and contains all of the terms and conditions agreed upon with respect to the subject matter hereof and cannot be amended or modified except by an instrument in wri-

ting signed by both Parties. This Agreement shall be binding upon and inure to the benefit of the Parties hereto, their successors, and assigns.

10. The Parties agree that this Agreement may be executed in counterparts, all of which together, so executed, shall constitute one and the same instrument.

11. This Agreement shall be construed under the laws of the State of Iowa.

12. Each Party hereto expressly warrants that it has the full power and authority to enter into this Agreement and to execute the same, and that there is no constraint upon such Party's legal ability to perform its responsibilities hereunder.

13. Specific performance shall be available as a remedy for breach of this Agreement in addition to all other legal or equitable remedies that are available under this Agreement.

14. If, on account of an alleged breach or default by either Party of its obligations under this Agreement, the other Party shall employ an attorney to enforce or defend any of its rights or remedies under this Agreement, the prevailing party shall be entitled to recover its reasonable costs incurred in such connection, including but not limited to reasonable attorney's fees. These costs shall not exceed TWO THOUSAND DOLLARS (\$2,000.00).

15. In the event that the FCC does not issue an order providing for the changes to the Table of Allotments and the modification of Ingstad's Station and Jacobson's Station proposed in the Petition, this agreement will be terminated

provided however if Ingstad terminates or FCC does not approve, it shall reimburse Jacobson for reasonable attorneys fees and engineering fees for work incurred just prior to said termination.

IN WITNESS WHEREOF, the parties have affixed their signatures to this agreement on the date(s) indicated below.

Dated: March 12, 1992

RADIO INGSTAD OF IOWA, INC.

By:  _____

Kevin Lein

Dated: March 14, 1992

JACOBSON BROADCASTING ENTERPRISES

By:  _____

Roger J. Jacobson

EXHIBIT C

FM Spacing study

Title: BOONE IA
Channel 252C2 (98.3 MHz)
Database: DW 01/29/92

Latitude: 41-49-00
Longitude: 93-42-00
Safety zone: 65 km

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
KGCI	LIC	FM IOWA INCORPORATED	249A	6	42-25-35	50.5	107.6	55
GRUNDY CENTER	IA	BLH-910221KB	97.7	100	92-41-22	231.2	52.57	CLEAR
License Granted 12/10/91 per FCC release #21276 dated 12/16/91;								
Ant: Phelps Dodge CMF-AP3; Affiliated with KDAO(AM)								
KHBT	LIC	CHRISTENSEN BROADCASTING	249A	3	42-43-57	337.9	110.0	55
HUMBOLDT	IA	BLH-4848	97.7	84	94-12-23	157.6	54.97	CLEAR
Network: AP								
KCMR	ORD	TLC BROADCASTING CORPORA	250A		43-07-18	15.8	150.9	55
MASON CITY	IA	DOC-88-141	97.9		93-11-32	196.2	95.85	CLEAR
ORDERED FROM 252A								
KHAK-FM	LIC	QUASS BROADCASTING COMPA	251C1	100	41-55-28	85.3	173.5	158
CEDAR RAPIDS	IA	BLH-790823AG	98.1	140	91-36-55	266.7	15.49	CLOSE
Affiliated with KHAK(AM)								
KIAB	CP	G.O. RADIO BOONE INCORPO	252C3	12.6	41-58-49	349.8	18.47	177
BOONE	IA	BPH-900919II	98.3	143	93-44-23	169.7	-159	SHORT
ORDERED FROM 252A; CP Granted 02/25/91 per FCC release #21063 dated 03/05/91;								
Was KWBG-FM 10/04/91 per FCC release #168 dated 10/04/91;								
Affiliated with KWBG(AM)								
KIAB	LIC	G.O. RADIO BOONE INCORPO	252A	3	42-01-22	327.5	27.18	166
BOONE	IA	BLH-790307AD	98.3	64	93-52-36	147.4	-139	SHORT
Deletion proposed; ORDERED TO 252C3; Network: ABC;								
Was KWBG-FM 10/04/91 per FCC release #168 dated 10/04/91;								
Affiliated with KWBG(AM)								
KCMR	LIC	TLC BROADCASTING CORPORA	252A	3	43-07-18	15.8	150.9	166
MASON CITY	IA	BLH-790416AB	98.3	91	93-11-32	196.2	-15.1	SHORT
Deletion proposed; ORDERED TO 250A								
KEMB	LIC	JACOBSON BROADCASTING CO	252A	3	43-01-20	328.9	157.2	166
EMMETSBURG	IA	BLH-7417	98.3	91	94-41-59	148.2	-8.83	SHORT
Network: ABC								
PRM	PROPOSED	RULE MAKING	253C3		42-31-30	52.1	129.7	117
CEDAR FALLS	IA	DOC-89-592	98.5		92-27-06	233.0	12.73	CLOSE
PRM adopted 12/07/89, released 01/02/90								
ALLOC			253C		41-17-00	253.6	201.5	188
OMAHA	NE		98.5		96-00-30	72.1	13.50	CLOSE
Allocated to COUNCIL BLUFFS IA								
KQKQ-FM	LIC	MITCHELL BCG CO OF IOWA	253C	100	41-18-25	254.5	202.2	188
COUNCIL BLUFFS	IA	BLH-880712KB	98.5	358	96-01-37	72.9	14.20	CLOSE
See OMAHA NEB; Affiliated with KLNG(AM)								

JAMES INGSTAD BROADCASTING
FARIBAULT, MN

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FM Spacing study

Title: BOONE IA
Channel 252C2 (98.3 MHz)

Latitude: 41-49-00
Longitude: 93-42-00

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
KMGO	LIC	KMGO INCORPORATED	254C1	100	40-47-34	148.7	132.9	79
CENTERVILLE	IA	BLH-6437	98.7	137	92-52-47	329.2	53.85	CLEAR
Network: ABC; Affiliated with KCOG(AM)								

KLSN	LIC	LYON COMPANY INCORPORATE	255A	3	42-00-59	291.9	60.15	55
JEFFERSON	IA	BLH-891211KD	98.9	31	94-22-26	111.5	5.146	CLOSE
Call Granted 11/10/88;								
License Granted 03/14/90 per FCC release #20815 dated 03/22/90								

NEW	APP	JOHN LINDER	255A	6	42-39-15	21.8	100.4	55
HAMPTON	IA	BPH-910219MK	98.9	98	93-14-37	202.1	45.37	CLEAR
Received per FCC release #14944 dated 03/07/91,								
tendered per 14964 dated 04/02/91, accepted per NA-146 dated 05/01/91								

ALLOC	GRANTED	EFF 5/2/88	255A		42-44-30	21.3	110.5	55
HAMPTON	IA	DQC-87-363	98.9		93-12-30	201.6	55.46	CLEAR
Filing window 05/03-06/02/88 **CLOSED**								

>> End of channel 252C2 study <<

JAMES INGSTAD BROADCASTING
FARIBAULT, MN

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FM Spacing study

Title: BOONE IA
Channel 252C2 (98.3 MHz)
Database: FCC 12/24/91

Latitude: 41-49-00
Longitude: 93-42-00
Safety zone: 65 km

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
ALLOD			249A		42-25-35	50.5	107.6	55
Grundy Center	IA		97.7		92-41-22	231.2	52.57	CLEAR
Coordinates updated from CP record			BPH890522IB					
KGCI	LIC	Grundy Broadcasting Comp	249A	6	42-25-35	50.5	107.6	55
Grundy Center	IA	BLH-910221KB	97.7	100	92-41-22	231.2	52.57	CLEAR
KHBT	LIC	Christensen Broadcasting	249A	3	42-43-57	337.9	110.0	55
Humboldt	IA	BLH-4848	97.7	84	94-12-23	157.6	54.97	CLEAR
ALLOD			249A		42-43-57	337.9	110.0	55
Humboldt	IA		97.7		94-12-23	157.6	54.97	CLEAR
Coordinates updated from LIC record			BLH4848					
KCMR	LIC	TLC Broadcasting Corpora	250A	4.50	43-07-18	15.7	150.7	55
Mason City	IA	BMLH-900716KH	97.9	91	93-11-50	196.0	95.74	CLEAR
ALLOD			251C1		41-55-28	85.3	173.5	158
Cedar Rapids	IA		98.1		91-36-55	266.7	15.49	CLOSE
Coordinates updated from LIC record			BLH790823AG					
KHAK-FM	LIC	Quass Broadcasting Compa	251C1	100	41-55-28	85.3	173.5	158
Cedar Rapids	IA	BLH-790823AG	98.1	140	91-36-55	266.7	15.49	CLOSE
KIAB	CP	G.O. Radio Boone, Inc.	252C3	12.5	41-58-49	349.8	18.47	177
Boone	IA	BPH-900919II	98.3	143	93-44-23	169.7	-159	SHORT
From Channel 252A per D89-334								
ALLOD			252C3		41-57-55	330.3	19.02	177
Boone	IA	DOC-89-334	98.3		93-48-50	150.3	-158	SHORT
SITE RESTRICTED-EFFECTIVE 8-30-90-RESERVED FOR KWBGFM PER D89-334								
KIAB	LIC	G.O. Radio Boone, Inc.	252A	3	42-01-22	327.5	27.18	166
Boone	IA	BLH-790307AD	98.3	64	93-52-36	147.4	-139	SHORT
*To channel 253C3 per D89-334								
KEMB	LIC	Jacobson Broadcasting Co	252A	3	43-01-20	328.9	157.2	166
Emmetsburg	IA	BLH-7417	98.3	91	94-41-59	148.2	-8.83	SHORT
ALLOD			252A		43-01-20	328.9	157.2	166
Emmetsburg	IA		98.3		94-41-59	148.2	-8.83	SHORT
Coordinates updated from LIC record			BLH7417					
PRM	ADD	Boyer B/Cing Company, In	252C3		40-22-48	140.6	205.2	177
Memphis	MO	DOC-90-284	98.3		92-09-49	321.6	28.22	CLEAR
ALTERNATE PROPOSAL-SITE RESTRICTED 8.7 KM SOUTH.								

JAMES INGSTAD BROADCASTING
FARIBAULT, MN

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FM Spacing study

Title: BOONE IA
Channel 252C2 (98.3 MHz)

Latitude: 41-49-00
Longitude: 93-42-00

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of	License	St FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
PRM	ADD	Denise Neubauer	253C3		42-31-30	52.1	129.7	117
Cedar Falls		IA RM-7078	98.5		92-27-06	233.0	12.73	CLOSE
PRM								
ALLOC			253C		41-15-43	251.8	190.6	188
Council Bluffs		IA	98.5		95-51-39	70.4	2.550	CLOSE
KQKQ-FM LIC		KRCB, Inc.	253C	100	41-18-25	254.5	202.2	188
Council Bluffs		IA BLH-880712KB	98.5	358	96-01-37	72.9	14.20	CLOSE
ALLOC			254C1		40-47-34	148.7	132.9	79
Centerville		IA	98.7		92-52-47	329.2	53.85	CLEAR
Coordinates updated from LIC record			BLH6437					
KMGO	LIC	KMGO, Inc.	254C1	100	40-47-34	148.7	132.9	79
Centerville		IA BLH-6437	98.7	137	92-52-47	329.2	53.85	CLEAR
KLSN	LIC	Lyon Company	255A	3	42-00-59	291.9	60.15	55
Jefferson		IA BLH-891211KD	98.9	31	94-22-26	111.5	5.146	CLOSE
ALLOC			255A		42-01-05	291.9	60.90	55
Jefferson		IA DOC-84-231	98.9		94-22-58	111.4	5.898	CLOSE
# 11 - SITE RESTRICTED; Filing window 04/07-05/07/86 **CLOSED**								
NEW	APC	John Linder	255A	6	42-39-15	21.8	100.4	55
Hampton		IA BPH-910219MK	98.9	98	93-14-37	202.1	45.37	CLEAR
Cut-off 06/04/91								
ALLOC			255A		42-44-30	21.3	110.5	55
Hampton		IA DOC-87-363	98.9		93-12-30	201.6	55.46	CLEAR
EFFECTIVE 5-2-88; Filing window 05/03-06/02/88 **CLOSED**								

>> End of channel 252C2 study <<

EXHIBIT D

FM Spacing study

Title: BOONE IO
Channel 261A (100.1 MHz)
Database: DW 01/29/92

Latitude: 43-04-00
Longitude: 94-49-00
Safety zone: 30 km

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
KUCB-FM LIC	CTR	FOR STUDY OF BLACK T	*207C2	9.72	41-36-15	148.6	189.7	15
DES MOINES	IA	BLED-841029CY	89.3	33	93-37-43	329.4	174.7	CLEAR
KHKE LIC	UNIV OF NORTHERN IOWA	*208C2	10		42-23-58	109.1	217.4	15
CEDAR FALLS	IA	BLED-791029AU	89.5	125	92-19-15	290.8	202.4	CLEAR
Network: AMP NPR								
ALLOC			258A		43-06-04	86.8	75.49	31
BRITT	IA	DOC-90-613	99.5		93-53-27	267.4	44.49	CLEAR
SITE RESTRICTION 4.5 MI W; Granted effective 08/23/91, adopted 06/24/91, released 07/09/91; Filing window 08/26-09/25/91 **CLOSED** ; DOC-90-613								
KKCK CP	KMHL BROADCASTING COMPAN	259C1	100		44-16-56	318.7	181.4	75
MARSHALL	MN BPH-880203IC	99.7	282		96-19-05	137.7	106.4	CLEAR
ORDERED FROM 261A; Network: ABC; CP Granted 05/18/88; Ant: Elec. Res. Inc. G5CPS-12AC-3; Affiliated with KMHL(AM)								
KAUS-FM LIC	ORION BROADCASTING COMPA	260C1	100		43-37-42	64.5	148.6	133
AUSTIN	MN BLH-4037	99.9	283		93-09-12	245.7	15.60	CLOSE
Affiliated with KAUS(AM)								
PRM	PROPOSED RULE MAKING	261A			43-12-12	277.7	121.0	115
ROCK VALLEY	IA DOC-90-472	100.1			96-17-30	96.7	5.968	CLOSE
PRM adopted 09/27/90, released 10/26/90								
ALLOC			262A		43-24-06	296.6	84.21	72
SIBLEY	IA DOC-84-231	100.3			95-44-48	116.0	12.21	CLOSE
Filing window 05/23-06/30/88 **CLOSED**								
PRM	DELETION PROPOSED	262A			43-24-06	296.6	84.21	72
SIBLEY	IA DOC-90-472	100.3			95-44-48	116.0	12.21	CLOSE
Deletion proposed; PRM adopted 09/27/90, released 10/26/90								
KLYF LIC	PALMER BROADCASTING PART	262C	100		41-48-33	144.4	171.2	165
DES MOINES	IA BLH-5820	100.3	518BT		93-36-53	325.2	6.154	CLOSE
Affiliated with WHO (AM)								
KXAC CP	ROGERS BROADCASTING INCO	263C2	50		43-52-29	10.9	91.45	55
SAINT JAMES	MN BMPH-910705IC	100.5	132		94-36-04	191.0	36.45	CLEAR
CP Granted 11/13/91 per FCC release #21290 dated 01/08/92; Call Granted 05/03/91 per FCC release #157 dated 05/03/91								
NEW APP	MINN-IOWA CHRISTIAN BCG,	264C3	25		42-40-18	128.9	69.76	42
EAGLE GROVE	IA 911004ME	100.7	100		94-09-11	309.3	27.76	CLEAR
Received per FCC release #15114 dated 10/28/91								

>> End of channel 261A study <<

FM Spacing study

Title: BOONE IO
Channel 261A (100.1 MHz)
Database: FCC 12/24/91

Latitude: 43-04-00
Longitude: 94-49-00
Safety zone: 30 km

Call	Auth	Licensee name	Chan	ERP-kW	Latitude	Br-to	Dist.	Req.
City of License	St	FCC File no.	Freq	EAH-m	Longitude	-from	(km)	(km)
KUCB-FM LIC	CTR for Study & Applicat	*207C3	9.70	41-36-15	148.6	189.7	12	
Des Moines	IA	89.3	34	93-37-43	329.4	177.7	CLEAR	
KHKE	LIC	University of Northern I	*208C3	10	42-23-58	109.1	217.4	12
Cedar Falls	IA	89.5	125	92-19-15	290.8	205.4	CLEAR	
ALLOC			258A		43-06-04	86.8	75.49	31
Britt	IA	DOC-90-613	99.5	93-53-27	267.4	44.49	CLEAR	
Site restricted-Effective 08-23-91; Filing window 08/26-09/25/91 **CLOSED**								
KKCK	CP	KMHL Broadcasting Compan	259C1	100	44-16-56	318.7	181.5	75
Marshall	MN	BPH-880203IC	99.7	292	96-19-15	137.6	106.5	CLEAR
FROM CHANNEL 261A per D86-516								
ALLOC			260C1		43-37-42	64.5	148.6	133
Austin	MN		99.9		93-09-12	245.7	15.60	CLOSE
Coordinates updated from LIC record BLH4037								
KAUS-FM LIC	Orion Broadcasting Compa	260C1	100	43-37-42	64.5	148.6	133	
Austin	MN	BLH-4037	99.9	283	93-09-12	245.7	15.60	CLOSE
PRM	DEL	F.C.C.	261C2		44-30-29	354.5	160.9	166
Olivia	MN	DOC-87-483	100.1		95-00-36	174.4	-5.10	SHORT
Alternate Channel in 87-483								
PRM	ADD		261C2		44-30-29	354.5	160.9	166
Olivia	MN	DOC-87-483	100.1		95-00-36	174.4	-5.10	SHORT
SITE RESTRICTED 29.7 KM SOUTH-ALTERNATE CHANNEL								
ALLOC			262A		43-24-06	296.6	84.21	72
Sibley	IA	DOC-84-231	100.3		95-44-48	116.0	12.21	CLOSE
# 72; Filing window 05/23-06/30/88 **CLOSED**								
KLYF	LIC	Palmer Broadcasting Limi	262C	100	41-48-33	144.4	171.2	165
Des Moines	IA	BLH-5820	100.3	518BT	93-36-53	325.2	6.154	CLOSE
ALLOC			262C		41-48-33	144.4	171.2	165
Des Moines	IA		100.3		93-36-53	325.2	6.154	CLOSE
Coordinates updated from LIC record BLH5820								
KXAC	CP	Rogers Broadcasting, Inc	263C2	50	43-52-29	10.9	91.45	55
St. James	MN	BMPH-910705IC	100.5	132	94-36-04	191.0	36.45	CLEAR
DOC-90-558								
NEW	APC	Minn-Iowa Christian Broa	264C3	25	42-40-18	128.9	69.76	42
Eagle Grove	IA	911004ME	100.7	100	94-09-11	309.3	27.76	CLEAR

>> End of channel 261A study <<

CERTIFICATE OF SERVICE

I, Karan Ferguson, a secretary to the law firm of Fisher, Wayland, Cooper and Leader, hereby certify that I have this 16th day of March, 1992, sent a copy of the foregoing "PETITION FOR RULEMAKING" to the following:

*Andrew J. Rhodes, Chief
Allocations Branch
Policy and Rules Division
Mass Media Bureau
Federal Communications Commission
2025 M Street, N.W. Room 8322
Washington, D.C. 20554

Lauren A. Colby, Esq.
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P.O. Box 113
Frederick, MD 21701
Counsel for Jacobson Broadcasting Companies


Karan Ferguson

*Hand Delivered